

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

JENNIFER VANDERSTOK *et al.*,

Plaintiffs,

v.

MERRICK GARLAND, in his official  
capacity as Attorney General of the United  
States *et al.*,

Defendants.

Case No. 4:22-cv-00691-O

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME**

Defendants respectfully move this Court for a ten-day extension for Defendants to file their reply brief in support of their cross-motion for summary judgment (ECF No. 180). In support of this motion, Defendants state as follows:

1. Original plaintiffs' and intervenor-plaintiffs' opposition briefs to Defendants' cross-motion were filed on March 6, 2023. *See* ECF Nos. 191-93.
2. Under the Court's Scheduling Order (ECF No. 105), Defendants' Response & Cross-Motion for Summary Judgment is presently due on March 27, 2023.
3. Defendants require additional time to prepare their responses and cross-motion for summary judgment because the original schedule was negotiated under the expectation of responding to one summary judgment opposition rather than two, because Defendants have been expending considerable litigation resources briefing a motion for a temporary restraining order and preliminary injunction in another case pending before this Court, and because of the press of business and other litigation.

4. Counsel for Plaintiffs Jennifer VanDerStok; Michael G. Andren; Tactical Machining, LLC; and Firearms Policy Coalition, Inc. (the original plaintiffs), as well as counsel for Plaintiffs BlackHawk Manufacturing Group Inc.; Defense Distributed; and Second Amendment Foundation, Inc. (intervenor-plaintiffs) are not opposed to this motion.

Accordingly, Defendants respectfully request that their unopposed motion for extension of time be granted.

DATED: March 20, 2023

Respectfully submitted,

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General

ALEXANDER K. HAAS  
Director, Federal Programs Branch

LESLEY FARBY  
Assistant Director, Federal Programs Branch

/s/ Daniel Riess  
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**CERTIFICATE OF CONFERENCE**

I certify that I have conferred with Plaintiffs' counsel to obtain their position on this motion. Counsel for both the original plaintiffs and intervenor-plaintiffs have stated that they are not opposed to the relief sought in this motion.

/s/ Daniel Riess

**CERTIFICATE OF SERVICE**

On March 20, 2023, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Daniel Riess